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20 *Attorneys for Defendant*

21 UNITED STATES DISTRICT COURT  
22 DISTRICT OF ARIZONA

23 **Rachael Gilburd**, an Arizona Resident;  
24 **Andrew Gebhart**, an Arizona Resident; **Daniel**  
25 **Featherstone**, an Arizona Resident; **Derek**  
26 **Martin**, an Arizona Resident; **Angela**  
27 **McGuire**, an Arizona Resident; **Kori Morin**,  
28 an Arizona Resident, **Katherine Redas**, an  
Arizona Resident, **Erin Salava**, an Arizona  
Resident; **David Vallejo**, a Michigan Resident;  
and **Nick Vincent**, an Arizona Resident,  
Individually and on Behalf of All Others  
Similarly Situated,

Plaintiffs,

v.

**Rocket Mortgage, LLC**, a Michigan limited  
liability company,

Defendant.

Case No: 2:23-cv-00010-DLR

**STIPULATION FOR STAY OF  
PROCEEDINGS AND  
TOLLING OF STATUTE OF  
LIMITATIONS**

1 Counsel for Plaintiffs and Defendant (together, the “Parties”) have been engaged  
2 in meet and confer discussions over notice as required by the Court’s December 7, 2023  
3 Order. During the meet and confer discussions, the parties have agreed to engage in  
4 mediation in an attempt to resolve the matter prior to notice.

5 Accordingly, the Parties jointly request that the Court stay all dates and deadlines  
6 in this case pending mediation as of the date of this stipulation. The parties will notify  
7 the Court of the selected mediator and mediation date on or before January 12, 2024. If  
8 the parties are able to select a mediator and a mediation date, the statute of limitations  
9 will be tolled through the date of mediation. If the date of mediation or the mediator  
10 changes, the parties will promptly advise the Court.

11 If the Parties are unable to agree either on a mediation date or a mediator by  
12 January 12, 2024 the Parties will advise the Court of that fact and will provide the  
13 supplemental briefing and proposed notice—including any joint notice form and  
14 agreement on the notice method, the opt-in period, and Defendant’s production of class  
15 members’ names and last known addresses—as required by the Court’s Order of  
16 December 7, 2023 (Dkt. No. 76) by January 19, 2024, and the statute of limitation shall  
17 remain tolled through that date.

18 The purpose of this stipulation is to attempt reach a negotiated settlement through  
19 mediation, and reduce litigation expenses; thus, good cause exists for the stipulation. If  
20 such a resolution is reached, the Parties will file a notice of settlement. If such resolution  
21 is not reached, the Parties will inform the Court of such. Nothing in this stipulation is  
22 intended to waive Plaintiffs’ and putative class members rights to file a future motion to  
23 toll the statute of limitations or Defendants right to oppose it. A form of Order is  
24 attached.

25 DATED this December 20, 2023.  
26  
27  
28

**JACKSON LEWIS P.C.**

By: /s/ J. Greg Coulter

J. Greg Coulter

Jamie M. Leach

Allan S. Rubin

Attorneys for Defendant

**WEILER LAW PLLC**

By: James Weiler (with permission)

James Weiler

Attorney for Plaintiff

**CERTIFICATE OF SERVICE**

I hereby certify that on December 20, 2023, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

James Weiler, AZ Bar No. 034371

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Attorney for Plaintiffs

By: /s/ Amalia Tafoya

4874-7466-6392, v. 2